

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

MICHAEL THAYYIL,

Plaintiff,

V.

INDIANA STATE UNIVERSITY,  
INDIANA STATE UNIVERSITY  
BOARD OF TRUSTEES, JOHN  
DOES 1-25,

Defendants.

Case No. 1:21-cv-00165-JPH-MG

**DEFENDANT INDIANA STATE UNIVERSITY AND INDIANA STATE UNIVERSITY  
BOARD OF TRUSTEES' PRELIMINARY WITNESS AND EXHIBIT LISTS**

Defendants Indiana State University (“ISU”) and Indiana State University Board of Trustees, by counsel, submits their Preliminary Witness and Exhibit Lists:

**WITNESSES**

1. Plaintiff Michael Thayyil
2. Meghan Steward, Fieldwork Advisor, Instructor and Clinical Coordinator, ISU's Occupational Therapy Program
3. Dr. Paula Jarrard, Assistant Professor and Program Director of ISU's OT Program, Department of Applied Medicine and Rehabilitation.
4. Dr. John Pommier, Chair and Professor of Department of ISU's Applied Medicine and Rehabilitation.
5. Dr. Denise Collins, Dean, ISU's College of Graduate and Professional Studies.
6. Lisa Decker, Associate Professor, ISU's College of Arts and Sciences.

7. Dr. Rusty Gonser, Professor, ISU's College of Arts and Sciences.
8. Dr. Caroline Mallory, Dean, ISU's College of Health & Human Services.
9. Jennifer Kiellach, owner of Sensory Solutions LLC in Sarasota, Florida.
10. Any individual identified by Plaintiff in his Initial Disclosures and/or witness lists.
11. Any individual deposed in this matter.
12. Any individual identified in any pleading or document produced through discovery.
13. Any individual needed for authentication, impeachment, rebuttal, or to lay proper foundations for the admission of evidence.

### **EXHIBITS**

1. Plaintiff's student records, including but not limited to his transcript and records relating to his performance in ISU's OT program; Plaintiff's eligibility under Section 504 and accommodations plan; records relating to Plaintiff's dismissal from the OT program; records relating to Plaintiff's appeal of the dismissal; and any other records relevant to the allegations in Plaintiff's Complaint.
2. Clinical Affiliation Agreement between ISU and Sensory Solutions LLC.
3. Handbooks, manuals, catalogs and other ISU materials, if any, relating to student academic performance and behavior, the OT program, fieldwork placements, and the dismissal and appeals process.
4. Correspondence between, among, or concerning Plaintiff, Ms. Steward, Dr. Jarrard, Dr. Pommier, Dr. Collins and/or Ms. Kiellach.
5. ISU policies and procedures relating to Section 504 of the Rehabilitation Act of 1973.
6. Any communications between Defendant and any of its representatives and Plaintiff and any of his representatives relevant to allegations in Plaintiff's Complaint.

7. Policies, course catalogs and handbooks of the Defendant relevant to allegations in Plaintiff's Complaint.
8. Pleadings in this matter.
9. Documents produced by any party or non-party to this action.
10. Any transcripts of depositions in this matter, including exhibits thereto.
11. Any exhibits listed by Plaintiff in his Initial Disclosures or exhibit lists.
12. Plaintiff's records relating to medical treatment and expenses, including statements, invoices, or other documents relating to payment for treatment.
13. Any reports of any expert.
14. Exhibits needed for authentication, impeachment, rebuttal, or to lay the foundation for the introduction of documents.

Respectfully Submitted,

/s/ Amy Steketee Fox

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*Attorneys for Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that on June 3, 2021, a true and exact copy of the foregoing was filed electronically via the Court's Electronic filing system. Notice of this filing was sent to the following persons by operation of the Court's Electronic filing system.

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/s/ Amy Steketee Fox  
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